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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JASON PROCTOR,
Plaintiff,

vs.

STATE FARM MUTUAL AUTOMOBILE
INSURANCE COMPANY; DOE INDIVIDUALS
1-20, inclusive; and ROE CORPORATIONS 1-20,
inclusive,
Defendants.

CASE NO.: 2:23-cv-01513-JAD-EJY

**STIPULATION AND ORDER TO
EXTEND DISCOVERY
DEADLINES**

Second Request

COME NOW, Plaintiff, JASON PROCTOR, by and through his counsel of record, Dimopoulos Law Firm, and Defendant STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY, by and through its counsel of record, Carmen Cooney Forbush, hereby stipulate to extend all discovery deadlines, including for the Parties to serve their disclosure of experts and expert reports for a period of approximately ninety (90) days.

1. The Parties experienced unforeseeable delays initiating discovery due to change of counsel.

2. During the course of discovery, Defendant recently disclosed an additional 3,862 pages of records on June 26, 2024, that are at the crux of several claims and defenses asserted herein that must be reviewed and analyzed by experts on each side before the upcoming expert disclosure deadlines.

3. The Parties are actively discussing resolution and may need to engage in a second mediation to resolve this matter, which the parties intend to schedule in mid-November to early December 2024.



4. Scheduling depositions of the plaintiff and State Farm's personnel have encountered difficulty and have not yet been completed.

5. The Parties need additional time to resolve this matter before engaging in costly expert discovery.

6. The Parties hereby stipulate to the proposed discovery deadlines:

Deadline	Old Date	New Date
Initial Expert Disclosures	November 19, 2024	January 19, 2025
Rebuttal Expert Disclosures	December 18, 2024	February 19, 2025
Discovery Cut-off	January 16, 2025	March 16, 2025
Dispositive Motion Deadline	March 16, 2025	April 16, 2025

DATED this 15th day of October, 2024

DIMOPOULOS LAW FIRM

/s/ Michael L. Shirts

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Attorneys for Defendant State Farm

Mutual Automobile Insurance Company

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ORDER

The Court, having considered the Parties' Stipulation to Extend Time for Discovery, and good cause appearing, hereby ORDERS that Discovery deadlines be continued as follows:

Deadline	Old Date	New Date
Initial Expert Disclosures	November 19, 2024	January 19, 2025
Rebuttal Expert Disclosures	December 18, 2024	February 19, 2025
Discovery Cut-off	January 16, 2025	March 16, 2025
Dispositive Motion Deadline	March 16, 2025	April 16, 2025

IT IS SO ORDERED.

Dated this 15th Day of October, 2024.

By 
Hon. Elayna Youcah
Magistrate Judge

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INJURY LAW

